



JUL - 2 2012

FCC Mail Room

Annual Reporting for High-Cost Recipients 47 C.F.R. §54.313(a)(2) through (a)(6) and (h) WestLink Communications, LLC

June 27, 2012

Ms. Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12th Street SW Washington, D.C. 20554

Ms. Karen Majcher Vice President – High Cost Low Income Division Universal Service Administrative Company 2000 L Street NW, Suite 200 Washington, D.C. 20036

RE: WC Docket No. 10-90: Annual Reporting Requirements for High-Cost Recipients §54.313 (a)(1) through (a)(6).

Pursuant to Section 54.313(a)(1) through (a)(6) of the Federal Communications Commission's rules, enclosed are the 2012 annual reporting requirements and certifications for WestLink Communications, LLC, Study Area Code 419015.

WestLink Communications, LLC is a state-designated ETC. For its July 2, 2012 submission the attachment summarizes the relevant information for §54.313 (a)(1) through (a)(6). For 54.313(a)(3) the information was not required to be collected during 2011 by the state commission, and therefore is exempted pursuant to paragraph 10 of Connect America Fund, WC Docket No. 10-90 et al., Order, 27 FCC Rcd 606, 608 (2011). The relevant reports required by the state commission are attached and pertain to 54.313(a)(1), (a)(2), and (a)(4). These consist of a progress report on the service quality improvement plan, service outages, and complaints per thousand handsets. WestLink Communications, LLC is also submitting the required certifications for 54.313(a)(5) and (a)(6).

Should you have any questions, please contact me via email at Catherine@pioncomm.net or by phone at 620-356-3211.

Sincerely,

Catherine Moyer CEO

Enclosures

Cc: Patrice Petersen-Klein
Executive Director
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027

Annual Reporting Requirements pursuant to § 54.313(a)(2)-(6) WC Docket No. 10-90

§ 54.313(a)(1) - Progress Report on five year service quality improvement plan.
	My company was not required to collect this information in 2011.
<u> </u>	My company collected this information pursuant to state utility commission requirement. A copy of the report is attached.
§ 54.313(a)(2	2) - Outage reporting
	My company was not required to collect this information in 2011.
<u> </u>	My company collected this information pursuant to state utility commission requirement. A copy of the report is attached.
§ 54.313(a)(3	B) - Unfulfilled service requests
x	My company was not required to collect this information in 2011.
	My company collected this information pursuant to state utility commission requirement. A copy of the report is attached.
§ 54.313(a)(4	e) - Customer complaints per 1000 connections
	My company was not required to collect this information in 2011.
<u> </u>	My company collected this information pursuant to state utility commission requirement. A copy of the report is attached.
§ 54.313(a)(5) - Service quality standards and consumer protection rules
	I certify that the reporting carrier is in compliance with applicable service quality standards and consumer protection rules.
§ 54.313(a)(6	e) - Ability to function in emergency situations
	I certify that the reporting carrier can function in emergency situations as set forth in 47 CFR §54.202(a)(2). Specifically, the reporting carrier has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.

I am authorized to make this certification on behalf of the company named above and, to the best of my knowledge the information reported on this form is accurate. This certification is for the study area(s) listed below. (Please enter your Company Name, State and Study Area Code

Company Name	State	Study Area Code	
WestLink Communications, LLC	Kansas	419015	

Mulli Myn	
[Signature of Corporate Officer	
Catherine Moyer	_
[Printed Name of Corporate Officer]	
CEO	
[Title of Corporate Officer]	

Carrier's Name WestLink Communications, LLC
Carrier's Address P.O. Box 707, Ulysses, KS 67880

Carrier's Tele# (620) 356-3211

Date:

June 27, 2012

Docket No. 12-GIMT-715-GIT

Annual Certification of Requirements Imposed by the Commission in Docket Number 06-GIMT-446-GIT and by the FCC as Codified in 47 C.F.R. §54.313

1. A competitive ETC must provide an updated two-year service quality improvement plan. A
competitive ETC must also provide a progress report on its prior two-year service quality
improvement plan ¹ . This report must include: a) a map detailing the progress in meeting targets;
b) an explanation of how FUSF and/or KUSF support has been used to improve service quality,
coverage, capacity, signal quality, etc.; and, c) an explanation of why any targets were not met in
the prior year.

- a) Please label updated two-year service quality improvement plan as Attachment 6a.
- b) Please label the map detailing your progress in meeting targets as Attachment 6b.
- c) For all investments listed in Attachments 4 and 5, please explain how FUSF and/or KUSF support have been used to improve service quality, coverage, capacity, signal quality, etc.

d) If applicable, please explain why any targets were not met.

Please use space below to answer c and d. Attach additional pages, as needed.						
See Attachments						

¹ Note: All ETCs will be required to provide a five-year service quality improvement plan beginning in 2013.

WestLink Communications, LLC, plans to use FUSF and KUSF disbursements over the next two years to improve service, quality, coverage, capacity and signal quality.

As during past years, WestLink will use FUSF and KUSF for multiple sites in WestLink's service territory, as well as for the wireless switch located in Ulysses, Kansas.

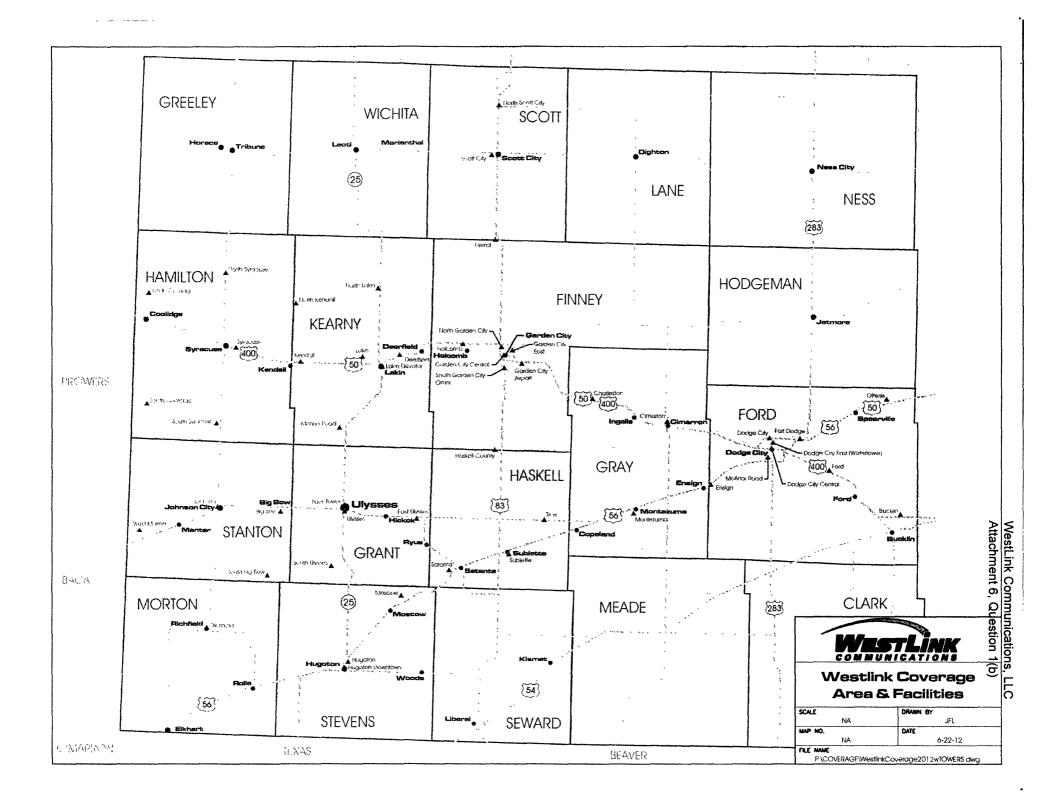
As a small, regional wireless carrier, WestLink prides itself in responding to customer issues and concerns with quick action. WestLink will use FUSF and KUSF to improve signal quality and coverage issues when highlighted by customers. This means upgrading equipment and installing additional antennas to fill in service holes, and provide stronger signal for in-building coverage. These upgrades cannot be directly identified in a two year build-out plan, but rather will occur as requested by customers.

During the second quarter of 2012, WestLink added a site in Satanta, Kansas, and Deerfield, Kansas.

During the second half of 2012, WestLink will add a new sites in the Tribune, Kansas market.

Over the next year, WestLink intends to find a 3G solution, dependent on pricing, by either purchasing equipment and switch upgrades, or entering into an agreement to host 3G services.

WestLink will continue to target the expansion of coverage, high data speeds, and general maintenance of facilities with the goal of providing exceptional service to the customers it serves.



WestLink Communications, LLC, used 2011 FUSF disbursement to help improve service, quality, coverage, capacity, and signal quality.

As shown in Attachments 4 and 5, FUSF was used for multiple sites in the WestLink service territory, as well as for the wireless switch located in Ulysses. FUSF was used to upgrade circuit equipment, and add antennas. The upgrades and additional antennas allowed WestLink's coverage to improve in WestLink's service area by filling in areas in which there was no WestLink service or very weak service. Additionally, this investment allowed WestLink's signal to be more pervasive throughout the service area by improving coverage and in-building coverage.

In additional to improving coverage, the upgrades allowed for higher data speeds to handsets. EDGE and GPRS technology provide larger amounts of bandwidth at higher speeds for WestLink handsets.

When WestLink applied for CETC status, it intended to use FUSF to expand and upgrade coverage within its service area. WestLink met that target with improved coverage and data speeds for existing sites. WestLink continues to target the expansion of coverage, higher data speeds, and general maintenance of facilities with the goal of providing exceptional service.

2. All ETCs must provide detailed information on any outage lasting at least 30 minutes for any facilities that an ETC owns, operates, leases, or otherwise utilizes that potentially affect at least 10% of the end users in a service area, or that could affect 911.

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Date of Outage	Time of Outage	Description of the Outage and Resolution	Particular services affected	Geographic Areas Affected	Steps Taken to Prevent Future Recurrences	Number of Customers Affected				
		NONE								
			:							
:										

(If necessary, please provide additional pages.)

3. Please provide the number of complaints per 1,000 connections (fixed or mobile). A complaint is any non-duplicative verbal or written complaint received by the company, FCC, and/or KCC.

WestLink received an average of 21.09 trouble tickets per 1,000 lines in 2011. These trouble tickets encompass all troubles ranging from handset issues to data issues to voice issues. WestLink is not aware of any complaints received by the FCC or the KCC.